# FILED

AUG - 7 2018

THOMAS G. BRUTON CLERK, U.S. DISTRICT COURT UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA	)	No. 18CR 477
v.	)	Violations: Title 26, United States Code, Section 7206(1)
SHULI ZHAO	)	JUDGE DURKIN MAGISTRATE JUDGE COLE

## **COUNT ONE**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about April 15, 2014, in the Northern District of Illinois, Eastern Division,

#### SHULI ZHAO,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2013, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1 of Schedule C that gross receipts of a business known as Katy's Dumpling House located in Westmont, Illinois were \$162,807, when defendant knew that gross receipts substantially exceeded that amount;

## **COUNT TWO**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about August 22, 2014, in the Northern District of Illinois, Eastern Division,

## SHULI ZHAO,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Corporate Income Tax Return for Katy's Dumpling House, Inc. (Form 1120 with schedules and attachments), for the calendar year 2013, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1a that gross receipts were \$851,029, when defendant knew that gross receipts substantially exceeded that amount;

## **COUNT THREE**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about April 15, 2015, in the Northern District of Illinois, Eastern Division,

#### SHULI ZHAO,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2014, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1 of Schedule C that gross receipts of a business known as Katy's Dumpling House located in Westmont, Illinois were \$166,143, when defendant knew that gross receipts substantially exceeded that amount;

#### **COUNT FOUR**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about August 28, 2015, in the Northern District of Illinois, Eastern Division,

#### SHULI ZHAO,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Corporate Income Tax Return for Katy's Dumpling House, Inc. (Form 1120 with schedules and attachments), for the calendar year 2014, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1a that gross receipts were \$871,843, when defendant knew that gross receipts substantially exceeded that amount;

## **COUNT FIVE**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about March 15, 2016, in the Northern District of Illinois, Eastern Division,

## SHULI ZHAO,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Corporate Income Tax Return for Katy's Dumpling House, Inc. (Form 1120 with schedules and attachments), for the calendar year 2015, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1a that gross receipts were \$722,402, when defendant knew that gross receipts substantially exceeded that amount;

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**COUNT SIX** 

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about April 15, 2016, in the Northern District of Illinois, Eastern

Division,

SHULI ZHAO,

defendant herein, willfully made and subscribed, and caused to be made and

subscribed, a U.S. Individual Income Tax Return (Form 1040 with schedules and

attachments), for the calendar year 2015, which return was verified by a written

declaration that it was made under penalties of perjury and was filed with the

Internal Revenue Service, which return he did not believe to be true and correct as to

every material matter, in that said return reported on Line 1 of Schedule C that

gross receipts of a business known as Katy's Dumpling House located in Westmont,

Illinois for the reported period were \$41,378, when defendant knew that gross

receipts for the reported period substantially exceeded that amount;

In violation of Title 26, United States Code Section 7206(1).

FOREPERSON

UNITED STATES ATTORNEY